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December 2, 2019

Via Fax, Email and NYSD-ECF

Honorable Judge Koeltl
 United States Courthouse
 500 Pearl St.
 New York, NY 10007-1312

*Conference adjourned to
 2/10/20 at 4³⁰ p.m.
 So ordered.*

*gk6/Koeltl
 u/s D.S.*

Re: RODRIGUEZ v. SIMEONIDIS et al.
 Docket No.: 1:19-CV-08681
 Our File No: E-06280

12/3/19

Dear Honorable Judge Koeltl:

The undersigned represents Plaintiff with regard to the above-referenced action. My office has been unable to eFile this correspondence due to issues with Pacer and chambers advised to send this letter by fax.

This matter stems from a motor vehicle accident that occurred on March 10, 2019 resulting in personal injuries to Plaintiff. This case is scheduled for an initial conference today, December 3, 2019, at 4:30 p.m. This correspondence is submitted on consent of the two parties that have filed a notice of appearance on NYSD-ECF. It is hereby requested that today's conference be adjourned. There have been no previous requests for adjournment of the initial conference.

My office obtained consent for the adjournment from Gregory Walthall of Varvaro, Cotter & Bender, attorneys for Defendants Kyle Long, Live Sound Company, and Live International Ltd. My office has emailed and left a voice message for handling attorney, Ronese Brooks of Law Offices of Burke, Conway & Stiefeld, attorneys for Defendant Christina Simeonidis. Ms. Simeonidis has been out of the office and we were redirected to another attorney and we have left voice messages for that attorney as well. We have yet to hear back from attorneys for Christina Simeonidis.

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The reason for the adjournment request is that the parties are engaged in meaningful discussions to resolve this matter. Settlement negotiations are ongoing between Chubb Insurance and the Plaintiff. Chubb has indicated that it will either be providing a settlement offer in response to Plaintiff's demand or acquiescing to private mediation to be scheduled and held forthwith. Given the above, it is respectfully requested that the conference be adjourned sixty days or for a time period convenient to the Court.

Thank you for your time and attention to this matter and please accept our apologies that this request was not submitted 48 hours prior to the scheduled appearance.

~~Very truly yours,
KHAVINSON & ASSOCIATES, P.C.~~

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